

Rebel Creek Ranch

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Docket No. 05-015-1
Regulatory Analysis and Development, PPD
APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 05-015-1

As Chairman of Nevada Cattlemen's Association Animal Issues Committee and member of the Northwest Pilot Project's Board of Directors, as well as a participant in the Northwest Pilot Project, I have gained a better understanding of the potential benefits, and drawbacks, involved in a National Animal Identification System. The NAIS should be flexible, allowing for the use of time proven systems such as brands. Brand inspections are required by law for movement of cattle and change of ownership in many states. Since a brand inspector is already present at these times, they would add another element of credibility used for verifying and recording information on cattle movements for the NAIS. The system should not be government run. A privately run program could provide more incentives to producers, such as age and source verification that could add value, and insure protection of producer information, while at the same time still provide State and Federal officials with the appropriate information when needed in a timely manner. As a participant in the Northwest Pilot Project, others and myself have shown that moving cattle in group lots can work and should remain an option in some instances. In the West where ranchers run on public lands, co-mingling is a common occurrence. Regulations and policies of the agencies that manage these lands, for example the United States Bureau of Land Management, will not allow for the construction of the type of facilities that it would take to individually identify each animal.

Sincerely,



Ron Cerri

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